

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

JANE DOE,

Plaintiff,

vs.

Case No. 14-CV-200-JPS

COUNTY OF MILWAUKEE and XAVIER
THICKLEN,

Defendants.

MOTION FOR LEAVE TO CONTACT JURORS

Pursuant to General L.R. 47(c), defendant Milwaukee County requests leave for its counsel to contact the seven individuals who served on the jury during the June 5, 2017 to June 7, 2017 trial in this case. In support of this motion, Milwaukee County states as follows:

1. Under this Court's Local Rules, parties and their attorneys may not directly or indirectly "approach, interview, or communicate with a venire member or juror, before, during, or after trial, except on leave of Court granted upon notice to opposing counsel and upon good cause shown." Gen. L.R. 47(c). For purposes of this rule, "[g]ood cause may include a trial attorney's request for permission to contact one or more jurors after trial for the trial attorney's educational benefit." *Id.*

2. Pursuant to Rule 47(c), the undersigned attorneys—all of whom were present at the trial in this case—request leave to contact members of the jury for their educational benefit. Specifically, the purpose of the requested contact would be to obtain feedback regarding the strength and weaknesses of their arguments and trial presentation, as well as how their presentation of the case compared with Plaintiff's presentation of the case.

3. If permitted, it is anticipated that the communications would be conducted in writing or over the phone or, if an individual juror preferred, at an in-person meeting.

4. If this motion is granted, at the outset of any communication with a juror, counsel will advise the juror that his or her participation in the conversation is completely voluntary, that he or she is under no obligation to discuss the case with counsel, and that he or she can discontinue the communication at any time.

WHEREFORE, defendant Milwaukee County requests that its counsel be allowed to make contact with and interview jurors who willingly and voluntarily agree to such an interview, for the purposes described above.

Dated this 15th day of June, 2017.

s/ Andrew A. Jones

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